



New BMPs Requested by Virginia

Perkinson, H. (DCR) to: Kelly Shenk

08/27/2010 06:52 PM

"Pollock, Alan (DEQ)", Ann Carkhuff, cbrosch, "Frye, Jack (DCR)",
Cc: Katherine Antos, "Pattison, Kenn", Lucinda Power, mdubin, pbuckley,
Lucinda Power, "Keeling, William (DCR)", Richard Batiuk

1 attachment



Septic_Nursery BMPs.doc

Kelly - Attached is a summary document containing description of 3 new BMPs Virginia is requesting. Two of these involve onsite/septic BMPs, a dire need for the CBP since there are presently only 3 septic BMPs in the Model (denitrification systems, pumpouts, and hook-ups). The 3rd BMP we propose pertains to container nurseries and greenhouses, a high loading sector per acre. I hope approval of these can be expedited.

Regards,
Russ

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-----Original Message-----

From: shenk.kelly@epamail.epa.gov [mailto:shenk.kelly@epamail.epa.gov]
Sent: Friday, August 27, 2010 10:43 AM
To: Perkinson, H. (DCR)
Cc: Pollock, Alan (DEQ); Carkhuff, Ann@epamail.epa.gov;
cbrosch@chesapeakebay.net; Frye, Jack (DCR);
Antos.Katherine@epamail.epa.gov; Pattison, Kenn;
Power.Lucinda@epamail.epa.gov; mdubin@chesapeakebay.net;
pbuckley@state.pa.us; Power.Lucinda@epamail.epa.gov; Keeling, William
(DCR)
Subject: RE: VA WIP - Issue with Post Processed Reduction Estimates

Great Russ on both accounts!

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>

08/27/2010 07:29
AM

To
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Subject
RE: VA WIP - Issue with Post
Processed Reduction Estimates

Kelly - Pertaining to your statement on the nursery BMP, we do have this defined in our draft WIP you will see soon. However, I'll send the definition/description up later today along with 2 onsite/septic BMPs we had previously made CBP aware of and had requested the Wastewater Workgroup to consider some time ago.

Concerning the CNT, consider this our formal request that the WQGIT amend the current procedure so that credit for CNT acres can also be eligible for the NMP BMP.

Regards,
Russ

-----Original Message-----

From: shenk.kelly@epamail.epa.gov [mailto:shenk.kelly@epamail.epa.gov]
Sent: Thursday, August 26, 2010 10:15 AM
To: Perkinson, H. (DCR); Pollock, Alan (DEQ)
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cbrosch@chesapeakebay.net; mdubin@chesapeakebay.net;
Batiuk.Richard@epamail.epa.gov; Power.Lucinda@epamail.epa.gov
Subject: VA WIP - Issue with Post Processed Reduction Estimates

Hi Russ and Alan,

We noticed from the handouts provided at the August 24 VA SAG meeting that you are counting on post-processed reduction estimates for nursery BMP and CNT. We want to be clear that EPA is not allowing for post-processed reductions outside of the CB Watershed Model.

Regarding the nursery reuse BMP, we need you to provide supporting documentation to allow for us to determine how best to model it and decide on a placeholder interim efficiency.

Regarding CNT - because we already have acres reported under this practice with a CBP-approved efficiency, we need to continue to use that efficiency until it is updated in the near future through convening of technical panels as per the CBP-approved process. For that to happen, it is critical that VA (and we know PA is interested in this as well, and likely MD) make an official WQ Goal Implementation Team to get this on a fast track.

Please follow up with Mark Dubin and/or Chris Brosch if you have further questions.

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